

EX PARTE OR LATE FILED



ORIGINAL

DOCKET FILE COPY ORIGINAL

Kathleen Q. Abernathy  
Vice President  
Federal Regulatory

AirTouch Communications  
1818 N Street N.W.  
Washington, DC 20036

Telephone: 202 293-4960  
Facsimile: 202 293-4970

July 14, 1994

**EX PARTE**

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, NW, Room 222  
Washington, DC 20554

**RECEIVED**  
**JUL 14 1994**  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

RE: PR Docket 93-61, Automatic Vehicle Monitoring Systems

Dear Mr. Caton:

The attached letters have been forwarded to the Commission. Please associate this material with the above-referenced proceeding.

Two copies of this notice were submitted to the Secretary of the FCC in accordance with Section 1.1206(a)(1) of the Commission's Rules.

Please stamp and return the provided copy to confirm your receipt. Please contact me at 202-293-4960 should you have any questions or require additional information concerning this matter.

Sincerely,

Kathleen Q. Abernathy

Attachments

No. of Copies rec'd  
List ABCDE

041

June 9, 1994

Eastern Distribution Center  
300 Gap Way  
Erlanger, Kentucky 41018  
Phone (606) 283-1100

RECEIVED

JUL 14 1994

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

Chairman Reed E. Hundt  
Commissioner Andrew C. Barrett  
Commissioner Rachelle Chong  
Commissioner Susan Ness  
Commissioner James H. Quello  
Federal Communications Commission  
1919 M. Street N.W.  
Washington, DC 20554

Dear Chairman Hundt & Commissioners Barrett, Chong Ness, Quello:

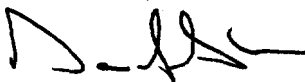
Theft of cargo has escalated dramatically in the last few years, and by all indications, it will continue on its upward trend. Losses are not confined to any specific geographic area but are a national problem. Unfortunately, we are a statistic of this trend, having experienced cargo losses in the hundreds of thousands of dollars within the past two years.

We have joined in partnership with our carriers to reconfigure physical layouts of facilities, vary route times and deliveries, but to date, the most effective tool we utilize is the Teletrac System. This system was recommended through other commercial companies and through law enforcement agencies. Teletrac allows for real time tracking of product, quick response to losses and most importantly, the size of the device allows for concealment in the tractor/trailer. Satellite systems, with the requirements of a dish antenna, are like beacons for thieves to simply destroy, effectively making the system inoperable.

I understand your committee is formalizing the FCC rules under which Teletrac operates. I am writing to express my thoughts on the benefits of radio location technology and how companies such as AirTouch Teletrac are an integral part of our loss prevention strategy.

Sincerely,

THE GAP, INC.



Dan J. Shaw  
Director Loss Prevention

DJS:ML

GAP

cc: Thomas P. Stanley, Chief Engineer, OET  
Bruce A. Francs, Deputy Chief Engineer, OET  
Richard M. Smith, Chief, FOB  
Michael J. Marcus, Assistant Bureau Chief, FOB  
Ralph A. Haller, Chief, PRB  
Beverly G. Baker, Deputy Chief, PRB  
Rosalind K. Allen, Chief, PRB Rules Branch



June 17, 1994

Chairman Reed E. Hundt  
Commissioner Andrew C. Barrett  
Commissioner Rachelle Chong  
Commissioner Susan Ness  
Commissioner James H. Quello  
Federal Communications Commission  
1919 M. Street, N.W., Stop Code 0106  
Washington, D.C. 20554

Dear Chairman Hundt and Commissioners Barrett, Chong, Ness, Quello:

We recently completed a successful pilot program with AirTouch Teletrac and we would like to share our experiences with you. Hopefully, this letter will provide an example of how a commercial private fleet can use the Teletrac system to help enhance driver safety.

PepsiCo Food Services delivers food to its restaurants (Pizza Hut, Taco Bell, KFC) on a regular basis. Though our drivers carry no money they still get attacked all too frequently when they leave their trucks.

To help protect our drivers from these attacks, PFS instituted pilot programs using the Teletrac system. Vehicles were outfitted with a Teletrac unit, siren, and alarm system. Drivers were outfitted with a 2-button remote (car alarm type) that they carried in their pocket. When threatened, drivers were to push either the remote button that triggers a siren and/or the button that sends a silent emergency alert message to a security company.

On two separate occasions drivers were attacked. Both times they pushed the Teletrac button which sent an emergency message to a security company equipped with a Teletrac workstation. Because the security company was able to give the police the exact location of the vehicle, police responded within minutes. In one case they actually made an arrest, and as of this writing the perpetrator has been sentenced to 4 years in state prison.

We believe that Teletrac is an important tool in our efforts to safeguard our drivers from violence. We hope that our experience with the Teletrac system will help you in your rulemaking efforts.

Sincerely,

Greg Halvacs  
Manager, Corporate Security, CFE

cc: Thomas P. Stanley, Chief Engineer, OET  
Richard M. Smith, Chief, FOB  
Ralph A. Haller, Chief, PRB  
Rosalind K. Allen, Chief, PRB Rules Branch

Bruce A. Franca, Deputy Chief Engineer, OET  
Michael J. Marcus, Assistant Bureau Chief, FOB  
Beverly G. Baker, Deputy Chief, PRB

# ***SuperShuttle***

June 29, 1994

Chairman Reed E. Hundt  
Commissioner Andrew C. Barrett  
Commissioner Rachelle Chong  
Commissioner Susan Ness  
Commissioner James H. Quello  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

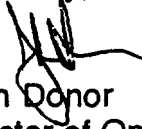
Dear Chairman Hundt and Commissioners Barrett, Chong, Ness and Quello:

I would like to take this opportunity to express my company's appreciation for, and the benefits that we have received, from the Airtouch Teletrac locating system.

We have been using Teletrac for approximately 9 months. In that time, the system has helped us to improve our level of customer service, help us keep better track of our fleet of vans (70 vehicles) and has even aided the police in the recovery of a stolen van. We feel that for the expenditure involved, the system more than pays for itself due to the fast, reliable tracking information that we are able to retrieve.

If I may be of any further assistance, please do not hesitate to contact me.

Sincerely,



John Donor  
Director of Operations

cc: Rosalind K. Allen, Chief, PRB Rules Branch  
Beverly G. Baker, Deputy Chief, PRB  
Bruce A. Franca, Deputy Chief Engineer, OET  
Ralph A. Haller, Chief, PRB  
Michael J. Marcus, Assistant Bureau Chief, FOB  
Richard M. Smith, Chief, FOB  
Thomas P. Stanley, Chief Engineer, OET



*Automatic Laundry Company, LTD.*

June 28, 1994

Chairman Reed E Hundt  
Commissioner Andrew C Barrett  
Commissioner Rachelle Chong  
Commissioner Susan Ness  
Commissioner James H Quello  
Federal Communications Commission  
1919 M Street NW  
Washington, DC 20554

Dear Chairman Hundt and Commissioners Barrett, Chong, Ness and Quello:

As the operations manager of Automatic Laundry Company, and a user of Teletrac services, I wish to bring our experiences with these services to your attention. This will assist you in your efforts to formalize the FCC rules under which Teletrac operates. Teletrac is a valuable service to our company in reducing fuel costs, improve dispatching and operating procedures, increase personnel and property safely and reduce over time. Continued use of Teletrac makes the company a better competitor in the industry. Automatic Laundry Company expects the service to continue to be available and would like to see Teletrac expand to other cities we serve.

Sincerely,

Automatic Laundry Company

Operations Manager

cc: Rosalind K Allen, Chief, PRB Rules Branch  
Beverly G Baker, Deputy Chief, PRB  
Bruce A Franca, Deputy Chief Engineer, OET  
Ralph A Haller, Chief, PRB  
Michael J Marcus, Assistant Bureau Chief, FOB  
Richard M Smith, Chief, FOB  
Thomas P Stanley, Chief Engineer, OET



**Universal Standard  
Medical Laboratories, Inc.**

21705 Evergreen  
Southfield, MI 48075

P.O. Box 5127  
Southfield, MI 48086-5127

**Tel** 313 358.0810  
**Toll Free** 800 255.1689  
**Fax** 313 358.2358

**June 20, 1994**

**Chairman Reed E. Hundt  
Commissioner Andrew C. Barrett  
Federal Communications Commission  
1919 M Street  
Washington, DC 20554**

**Dear Chairman Hundt and Commissioner Barrett:**

I would like to express to you how valuable the AirTouch Teletrac Automatic Vehicle Location (AVL) system has been to the transportation operation of our company, Universal Standard Medical Laboratories, Inc., of Southfield, Michigan. The Teletrac system has helped us to increase driver productivity, as well as increase revenue. We are also able to dispatch much more efficiently with this system.

We would like to see Teletrac expand to other cities and areas so that we could use their system in our other offices. I would encourage you to support AirTouch Teletrac by putting permanent rules in place for the 902-924 MHz bandwidth that protect innovative companies such as Teletrac.

Sincerely,



Jim Crain  
Transportation Manager  
Universal Standard Medical Laboratories, Inc.

**cc: Thomas P. Stanley, Chief Engineer, OET  
Bruce A. Franca, Deputy Chief Engineer, OET  
Richard M. Smith, Chief, FOB  
Michael J. Marcus, Assistant Bureau Chief, FOB  
Ralph A. Haller, Chief, PRB  
Beverly G. Baker, Deputy Chief, PRB  
Rosalind K. Allen, Chief, PRB Rules Branch**



AUTOMATIC APARTMENT LAUNDRIES, INC.

LAUNDRY ROOM PROFESSIONALS SINCE 1946

30295 SCHOOLCRAFT • LIVONIA, MICHIGAN 48150

June 17, 1994

Chairman Reed E. Hundt  
Commissioner Andrew C. Barrett  
Federal Communications Commission  
1919 M Street  
Washington, DC 20554

Dear Chairman Hundt and Commissioner Barrett:

I would like to inform you of the great asset that the Teletrac Automatic Vehicle Location (AVL) system is to our company, Automatic Apartment Laundries Inc., of Livonia, Michigan.

The AirTouch Teletrac Fleet Director System (AVL) is a valuable service to our company that has resulted in improved productivity and lower operating costs. With Teletrac, we have been able to increase driver productivity by approximately ten percent. In addition, ninety percent of the calls from the drivers to the dispatchers have been eliminated. We are also able to dispatch much more efficiently.

I would like to see Teletrac expand to other cities and areas so that we could use their system in our other offices. I would encourage you to support AirTouch Teletrac by putting permanent rules in place for the 902-924 MHz bandwidth that protect innovative companies such as Teletrac that bring inexpensive AVL services to businesses such as ours.

Sincerely,

A handwritten signature in black ink that reads 'Victor Lamb'. The signature is written in a cursive, flowing style.

Victor Lamb  
Service Manager  
Automatic Apartment Laundries Inc.

cc: Thomas P. Stanley, Chief Engineer, OET  
Bruce A. Franca, Deputy Chief Engineer, OET  
Richard M. Smith, Chief, FOB  
Michael J. Marcus, Assistant Bureau Chief, FOB  
Ralph A. Haller, Chief, PRB  
Beverly G. Baker, Deputy Chief, PRB  
Rosalind K. Allen, Chief, PRB Rules Branch

# PARAMED

486 SOUTH OPDYKE • PONTIAC, MICHIGAN 48341

June 17, 1994

Chairman Reed E. Hundt  
Commissioner Andrew C. Barrett  
Federal Communications Commission  
1919 M Street  
Washington, DC 20554

Dear Chairman Hundt and Commissioner Barrett:

AirTouch Teletrac has requested that we inform you about the usefulness of the Teletrac Automatic Vehicle Location (AVL) system and the impact that the system has made on our business, Paramed, Inc., an ambulance company in Pontiac, Michigan.

With an array of Global Positioning Services available on the marketplace, none serves our needs better than AirTouch Teletrac's Fleet Director System (AVL). When life threatening calls are taken by our dispatchers, it is critical to know which ambulance is closest to the incident. Teletrac's AVL system allows us to maximize our efficiency within dispatch to get to the incident as quickly as possible. Teletrac's system has also benefitted us in other areas including savings in mileage and overtime, which affect our ability to stay in business.

We at Paramed ask that you support AirTouch Teletrac by putting permanent rules in place for the 902-924 MHz bandwidth that protect innovative companies such as Teletrac that bring inexpensive AVL services to businesses such as Paramed.

Sincerely,



Dan Ret  
Communications Coordinator  
Paramed, Inc.

cc: Thomas P. Stanley, Chief Engineer, OET  
Bruce A. Franca, Deputy Chief Engineer, OET  
Richard M. Smith, Chief, FOB  
Michael J. Marcus, Assistant Bureau Chief, FOB  
Ralph A. Haller, Chief, PRB  
Beverly G. Baker, Deputy Chief, PRB  
Rosalind K. Allen, Chief, PRB Rules Branch

SUBURBAN AMBULANCE • PROFESSIONAL MEDICAL TRANSPORTATION • FLEET AMBULANCE

*We're there when you need us.*



June 17, 1994

The Honorable Commissioner  
Mr. Reed Hundt  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, DC 20554

Dear Commissioner Hundt:

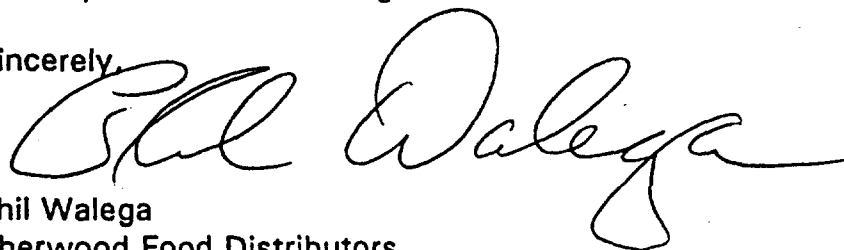
This letter is to share with you an experience that my company, Sherwood Food Distributors, has had with an AVL company, AirTouch Teletrac.

Last month, one of my vehicles was stolen while the driver was at a stop. The driver called the dispatching center at Sherwood Foods where the Teletrac workstation is centered, and was able to locate my vehicle. The vehicle was recovered within 30 minutes! It was parked in a residential area with a U-Haul truck blocking the view of the vehicle. Needless to say, we not only recovered the vehicle, but the contents of the truck were still there. I am thankful that I have invested in the Teletrac system!

Please show support for companies (AirTouch Teletrac) that are developing new technologies that aid in the security and safety for the business owners of today. Thank you for your time and energies.

I trust you will make the right decision.

Sincerely,



Phil Walega  
Sherwood Food Distributors

CC: Thomas P. Stanley, Chief Engineer, OET  
Bruce A. Franca, Deputy Chief Engineer, OET  
Richard M. Smith, Chief, FOB  
Michael J. Marcus, Assistant Bureau Chief, FOB  
Ralph A. Haller, Chief, PRB  
Beverly G. Baker, Deputy Chief, PRB  
Rosalind K. Allen, Chief, PRB Rules Branch



## DINVERNO RECYCLING INC.

June 20, 1994

Chairman Reed E. Hunt  
Commissioner Andrew C. Barrett  
Federal Communications Commission  
1919 M Street N.W.  
Washington, D.C. 20554

Dear Chairman Hunt and Commissioner Barrett:

I work for Dinverno Recycling, Inc., a waste hauling company in Detroit, which uses the Teletrac location system. Teletrac has helped us effectively manage our fleet by providing accurate, immediate vehicle locations. This has resulted in lower operating costs and improved productivity. Specifically, Teletrac enables us to give directions to lost drivers and more importantly, locate drivers taking unauthorized breaks.

Other alternatives that we considered provided neither location accuracy within 100 feet nor the other capabilities of Teletrac, and were much more expensive.

I hope this will offer insight in your efforts to formalize the FCC rules under which Teletrac operates.

Sincerely,

James W. Geroux  
Controller  
Dinverno Recycling, Inc.

cc: Thomas P. Stanley, Chief Engineer, OET  
Bruce A. Franca, Deputy Chief Engineer, OET  
Richard M. Smith, Chief, FOB  
Michael J. Marcus, Assistant Bureau Chief, FOB  
Ralph A. Haller, Chief, PRB  
Beverly G. Baker, Deputy Chief, PRB  
Rosalind K. Allen, Chief, PRB Rules Branch

4600 E. NEVADA  
DETROIT, MICHIGAN 48234  
892-3535 • FAX 892-4999



recycled paper

# DETROIT FORKLIFT, INC.

5630 EAST DAVISON  
DETROIT, MI 48212  
(313) 369-9232

June 20, 1994

Chairman Reed E. Hundt  
Commissioner Andrew C. Barrett  
Federal Communications Commission  
1919 M Street  
Washington, DC 20554

Dear Chairman Hundt and Commissioner Barrett:

As the Vice President of Detroit Forklift, Inc., I would like to share with you our experiences with the AirTouch Teletrac services. Teletrac has proven to be a valuable service allowing us to manage our fleet of service vehicles more efficiently which has resulted in lower operating costs, reduced fuel consumption, and improved productivity.

Specifically, we have been able to directly route our service and sales people to jobs or prospective accounts. Additionally, the potential abuse of vehicles or time on the job has been greatly reduced if not eliminated.

We would like to see an expansion of the Teletrac coverage area to other cities. I hope this will assist you in your efforts to formalize the FCC rules under which Teletrac operates.

Sincerely,



Jeff Hern  
Detroit Forklift, Inc.

CC: Thomas P. Stanley, Chief Engineer, OET  
Bruce A. Franca, Deputy Chief Engineer, OET  
Richard M. Smith, Chief, FOB  
Michael J. Marcus, Assistant Bureau Chief, FOB  
Ralph A. Haller, Chief, PRB  
Beverly G. Baker, Deputy Chief, PRB  
Rosalind K. Allen, Chief, PRB Rules Branch

**SB**  
**SmithKline Beecham**  
*Clinical Laboratories*

AUGUST 26, 1993

LOUIS FEDERICO  
PACTEL TELETRAC  
524 EAST LAMAR BLVD., SUITE 120  
ARLINGTON, TEXAS 76011

DEAR LOU:

THE PACTEL SYSTEM HAS IMPROVED OUR OPERATIONAL EFFICIENCY IN TWO PARTICULAR AREAS. THE FIRST IS THAT IT HELPS US TO LOCATE THE NEAREST COURIER WHEN WE HAVE A STAT CALL AND SAVES US TIME IN SEARCHING FOR THE CLOSEST DRIVER SO WE CAN GET TO OUR CUSTOMER'S LOCATION FASTER.

THE SECOND AREA IS IN ROUTE PLANNING FOR OUR COURIERS AND GIVING US A BETTER IDEA ON DEVISING ROUTES AND MAKING THEM MORE EFFICIENT FOR OUR DRIVERS AND IN TURN PROVIDING BETTER SERVICE TO OUR CUSTOMERS.

WE OUR VERY PLEASED WITH THE PACTEL SYSTEM AND RECOMMEND IT FOR OTHERS IN THE TRANSPORTATION INDUSTRY.

SINCERELY



SKIP CHESHER  
CLIENT SERVICES MANAGER



## Lewis Towing of Texas, Inc.

RRC 37514

903 J Place / Plano, Texas 75074 / (214) 423-4010 / Fax: (214) 422-2170



24 Hour Service

October 11, 1993

Ms. Cindy Hoyt  
PacTel Teletrac  
524 East Lamar Blvd., Suite 120  
Arlington, TX 76011

Dear PacTel:

I just wanted to let you know how happy we are with our tracking system. It has proven to be a very efficient tool in our field of work. With it we are able to get the closest driver to the call. This cuts down on our response time and fuel costs. We are also able to quote a more accurate price from the pick up site to the drop off site. Before, we would have to guess at how many miles it was from one point to another. With this tracking system, we are able to calculate distance with more accuracy--providing a more accurate estimated time of arrival for our customers. And when we have questions, everybody at PacTel is very willing and eager to help us find answers.

As a dispatcher, I personally am grateful for a tool such as this to be at my fingertips. It helps me on every call that I dispatch.

Yours truly,

Marcus Edwards  
Director of Communications



**BRIGGS-WEAVER®**  
**INDUSTRIAL TRUCKS**

SEPTEMBER 27, 1993

CINDY HOYT  
PACTEL TELETRAC  
DALLAS/FT. WORTH OPERATIONS  
524 E. LAMAR BLVD., SUITE 120  
ARLINGTON, TX 76011

DEAR CINDY,

BRIGGS WEAVER, INC., PURCHASED THE PACTEL TELETRAC VEHICLE LOCATOR SYSTEM IN MAY OF 1993.

WE USE THE SYSTEM TO ASSURE DRIVER COMPLIANCE TO WORK-RELATED ACTIVITIES, ASSURE COMPANY VEHICLES ARE NOT BEING USED AFTER-HOURS OR ON WEEKENDS EXCEPT FOR WORK-RELATED ACTIVITIES, AND TO MANAGE FLEET COSTS BY BETTER ROUTING OF VEHICLES THROUGHOUT THE DALLAS-FORT WORTH METROPLEX.

SINCE IMPLEMENTING THE PACTEL TELETRAC SYSTEM WE HAVE SAVED AN AVERAGE OF \$250.00 PER MONTH IN FUEL AND RELATED FLEET COSTS.

THE TELETRAC SYSTEM HAS PROVEN TO BE A VALUABLE FLEET MANAGEMENT TOOL FOR OUR COMPANY.

SINCERELY,

JUSTIN TURNER

